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BY ECF

June 13, 2024

Hon. Edgardo Ramos  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York 10007

## MEMO ENDORSED

US v. Adrean Coombs  
20 CR 481 (ER)

Your Honor:

I represent the above referenced defendant, Adrean Coombs (Reg 09690-509 Unit 71-MDC) before Your Honor. As this Court is well aware, Mr. Coombs has a history of mental health and addiction issues.

In my attempts to resolve this matter short of trial I have reached out to various mental health facilities to seek in-patient treatment. The programs I have contacted have rejected Mr. Coombs for various reasons following their intake interviews of Mr. Coombs. His complicated MICA issues make him difficult to place in ordinary narcotics addiction programs.

After completion of a mental health exam in accordance with Rule 35 Mr. Coombs was technically found "fit to proceed". Obviously, this determination does not eradicate his serious mental health issue.

In the party's attempt to resolve this matter we ask the Court to schedule a convenient date for all parties to discuss resolution before Your Honor. At such an appearance the Defense will be asking the Court to release the defendant. The reasoning behind such an application, with several strict conditions, is to grant Mr. Coombs access to health care professionals that can assist him with his addiction issues and mental health issues.

I have coordinated with a family member of Mr. Coombs, that upon his release, he would be escorted to the Medicaid Office to re-new his Medicaid card which is temporarily suspended. Following that appointment, Mr. Coombs would be escorted by the family member to St. Marks Institute for Mental Health on (St. Marks Place) East 8<sup>th</sup> Street in Manhattan for an intake interview. I want to be clear in stating that this would be an outpatient program. Because of the complications of a mental health disorder and addiction issues it has been extraordinarily difficult to place Mr. Coombs in an inpatient facility due to his diagnosis of schizophrenia and the liability for the programs that comes with it. Lastly, the family member would take Mr. Coombs to Beaver Street in Manhattan to get placement at a shelter. Ironically, the family member presently works

at a shelter for people struggling with mental health issues but she has communicated to me that her place of employment cannot accept Mr. Coombs for a number of reasons. I mention this to assure the Court that the family member is well equipped to handle people with mental health issues and should serve as an appropriate escort to carry out these tasks.

Following Mr. Coombs' placement the parties would reconvene to evaluate a solution to Mr. Coombs' legal matter before Your Honor. Noteworthy, Mr. Coombs has been incarcerated for three and one half years. He is "Safety Valve" eligible. A reasonable evaluation of a likely sentence in this matter 'may' include a time (already) served sentence.

The Defense asks that a date be set at a mutually convenient time for all parties preferably between the dates of June 18-20 or June 25-27 if that is convenient with the Court and Government.

Cc: AUSA Elizabeth Espinosa

Respectfully Submitted,  
/s/Matthew D. Myers  
Defense Counsel for Mr. Coombs

A status conference will be held on June 28, 2024, at 11 a.m.  
SO ORDERED.

  
Edgardo Ramos, U.S.D.J.  
Dated: 6/24/2024  
New York, New York